

# EXHIBIT I

**Walker, Leita**

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**From:** John N. Bisanz, Jr. [jnb@hensonefron.com]  
**Sent:** Thursday, August 23, 2012 3:52 PM  
**To:** David Bradley Olsen; Walker, Leita  
**Cc:** Borger, John P.; Soppeland, Miriam (Mimi)  
**Subject:** RE: FW: Ventura v. Kyle--recap of phone call  
**Attachments:** JNB\_0823154836\_001.pdf

Leita-

Thanks. Our original executed version is attached. You may e-sign on our behalf and file.

Regards,

John

John N. Bisanz, Jr.  
Attorney at Law

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>>> On 8/23/2012 at 3:42 PM, "Walker, Leita" <Leita.Walker@faegrebd.com> wrote:  
Does the attached work for you?

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**From:** John N. Bisanz, Jr. [mailto:jnb@hensonefron.com]  
**Sent:** Thursday, August 23, 2012 3:39 PM  
**To:** David Bradley Olsen; Walker, Leita  
**Cc:** Borger, John P.; Soppeland, Miriam (Mimi)  
**Subject:** RE: FW: Ventura v. Kyle--recap of phone call

Leita-

We would prefer to clarify that the stipulation so that it explicitly states that it does not affect the Governor's claims for damage to reputation, embarrassment or humiliation. The latter two were left out.

John

John N. Bisanz, Jr.  
Attorney at Law

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>>> On 8/23/2012 at 3:22 PM, "Walker, Leita" <Leita.Walker@faegrebd.com> wrote:

John, the attached document reflects this change. Please advise whether we can sign on your behalf and file it.

Leita

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**From:** John N. Bisanz, Jr. [mailto:jnb@hensonefron.com]  
**Sent:** Thursday, August 23, 2012 2:43 PM  
**To:** David Bradley Olsen; Walker, Leita  
**Cc:** Borger, John P.; Soppeland, Miriam (Mimi)  
**Subject:** RE: FW: Ventura v. Kyle--recap of phone call

Leita-

We will also agree to drop the "mental distress" claim, but not the embarrassment and humiliation claims.

Also, Governor Ventura did not seek treatment from any medical providers between September 30, 2006, and November 30, 2006. As such, we will not provide Authorization(s) for Disclosure of Health Information.

Regards,

John

John N. Bisanz, Jr.  
Attorney at Law

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>>> On 8/23/2012 at 1:34 PM, "Walker, Leita" <Leita.Walker@faegrebd.com> wrote:

John, if this is your position, then we still need medical records dating back to February 1, 2003, and will move to compel their production and for a complete response to Interrogatory No. 14.

Leita

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**From:** John N. Bisanz, Jr. [mailto:jnb@hensonefron.com]  
**Sent:** Thursday, August 23, 2012 12:13 PM  
**To:** David Bradley Olsen; Walker, Leita  
**Cc:** Borger, John P.; Soppeland, Miriam (Mimi)  
**Subject:** Re: FW: Ventura v. Kyle--recap of phone call

Leita-

Your draft stipulation should be revised so that it states only that any reference to "emotional distress" will be removed. We do not stipulate to the removal of references to embarrassment, humiliation, or mental distress.

Thanks,

John

John N. Bisanz, Jr.  
Attorney at Law

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>>> On 8/23/2012 at 8:45 AM, "Walker, Leita" <Leita.Walker@faegrebd.com> wrote:

David and John, attached is a proposed stipulation that reflects our discussion yesterday regarding Ventura's anticipated withdrawal of any claim for emotional distress damages. We would like to get this on file this morning so that we do not have to address the issue in our motion to compel, which we will be filing later today.

Also, if you could please confirm Ventura's willingness to provide medical records from the 2006 time period specified in my email from yesterday (below), I would appreciate it.

Sincerely,

**Leita Walker**

*Associate*

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**FAEGRE BAKER DANIELS LLP**

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**From:** Walker, Leita

**Sent:** Wednesday, August 22, 2012 2:26 PM

**To:** 'David Bradley Olsen'; John N. Bisanz, Jr.

**Cc:** Borger, John P.; Soppeland, Miriam (Mimi)

**Subject:** FW: Ventura v. Kyle--recap of phone call

David and John, as I just discussed with David on the phone, although Ventura's withdrawal of his

emotional distress allegation significantly limits our need for his medical records, we continue to seek the following:

- Identification of all healthcare providers who consulted with Ventura, advised him or treated him, between September 30, 2006, and November 30, 2006. Please state the dates and substance of all communications and treatments with respect to such healthcare providers. If no healthcare providers consulted with Ventura, advised him or treated him during this two-month time period, please so state.
- A sufficient number of completed and signed Authorization(s) for Disclosure of Health Information so that we may obtain the release of all records of any and all healthcare providers who have provided treatment to Ventura between September 30, 2006, and November 30, 2006.

Please advise whether your client agrees to respond to these requests, which are modifications of Interrogatory No. 14 and Document Request No. 13.

Leita

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**From:** Walker, Leita  
**Sent:** Wednesday, August 22, 2012 11:53 AM  
**To:** John N. Bisanz, Jr.; 'David Bradley Olsen'  
**Cc:** Borger, John P.; Soppeland, Miriam (Mimi)  
**Subject:** Ventura v. Kyle--recap of phone call

David and John,

This email memorializes the discussion we had by phone earlier this morning, in accordance with the Court's meet and confer requirement, regarding the motion to compel that we plan to file tomorrow.

During our phone call, you agreed to supplement the following interrogatories: No. 1, 9, 11(c), and 12. Specifically:

- In response to Interrogatory No. 1, you agreed to "identify" (as that term is defined in the discovery requests) each of Ventura's "principal businesses and employers and sources of income since January 1, 2003." As we discussed, Ventura's initial response is not sufficiently specific.
- In response to Interrogatory No. 9, you agreed to provide the requested information for the four individuals identified in your July 10 letter, including (1) the dates on which each individual mentioned to Ventura each or any of the Published Statements; (2) how Ventura knows, and when he came to know, each individual, to the extent that information is not provided in response to Interrogatory No. 4; and (3) the substance of the communication with Ventura concerning each or any of the Published Statements.
- In response to Interrogatory No. 11(c), you agreed, for the sake of completeness, to state (as you state in response to Interrogatory No. 14) that Ventura has not yet consulted any medical providers concerning damages suffered as a result of Kyle's statements.
- In response to Interrogatory No. 12, you agreed to either identify business/professional opportunities that Ventura has sought and been denied or, if none exist, to so state. Likewise you agreed to "identify" (as that term is defined in the discovery requests) each person who has stated or otherwise indicated to Ventura that he has lost out on a business/professional opportunity because of the Published Statements or, if no such individuals exist, to so state.

With regard to Interrogatory No. 14 and Document Request No. 13, you stated that Ventura will withdraw

any allegation that the Published Statements have caused him emotional or mental distress and that he will not seek damages for such distress. You indicated that you would send me an email confirming this representation.

You stated that you are in the process of reviewing documents received from Ventura and that we should expect to start receiving those on a rolling basis in the next few days and possibly by the end of the week.

Finally, we remind you that Ventura needs to sign his initial responses to the discovery requests, which he served more than two months ago, and that he also needs to sign both the first and (forthcoming) second set of supplemental responses.

Sincerely,

**Leita Walker**

*Associate*

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